LETTER FORMAT: Date: November 11, 1997

TO: Mr. Steve Tarlton, Rocky Flats Cleanup Agreement Project Coordinator
Hazardous Materials and Waste Management Division
Colorado Department Public Health and Environment
4300 Cherry Creek Drive, South
Denver, Colorado 80222-1530

FROM: DOE

Subject: Notification of Minor Modification of Proposed Action Memorandum for the Decommissioning of Building 123

In accordance with the Rocky Flats Cleanup Agreement, Part 10 Changes to Work, Paragraph 126, DOE is making a written notice to CDPHE of its intent to make minor modification to work being done pursuant to the 123 PAM. These modifications are made to

1. Clarify our proposed work process; and
2. Correct errors and omissions.

The changes as identified in this letter are minor in nature and do not represent a major modification to the 123 PAM. The proposed minor modifications are:

1. Addition of an explanation of the phased approach to the demolition of Building 123. This approach better details the operations required to D&D the 123 cluster. These changes will be added to Section 3.0 Project Approach and Objectives. The phased approach breaks down operations of a complex project into a more easily explained and manageable segments. It does not deviate from our general approach, just better explains it.
2. Section 2.4.5 Perchloric Acid has been modified as follows: To mitigate such a hazard, all hoods and duct work will be flushed and the rinsate directed to the Site ~~sanitary~~ process wastewater treatment plant in Building 374. The process waste lines never attached to the sanitary wastewater treatment system. This modification corrects an error.
3. Section 2.4.7 Polychlorinated Biphenyls (PCBs) has been modified as follows: Leaking PCB light ballasts and unmarked leaking light ballasts will be managed as fully-regulated PCB Articles. The word leaking was added for clarification.
4. A Summary of the Waste Management Plan has been added as Attachment D of the 123 PAM. This section was added to clarify and summarize the project's waste management.
5. Section 2.4.2 Beryllium has been modified as follows: ~~Initial decommissioning efforts in these rooms will include decontamination of all equipment surfaces~~. Decontamination of equipment contaminated with beryllium and subsequent free release of this equipment will be conducted in accordance with Kaiser-Hill and DOE guidance, policy and procedures. This section was added to clarify that decontamination will occur in accordance with Kaiser-Hill and/or DOE policy and guidance.
6. Section 2.4.7 was modified as follows: ~~No other potential PCB-contaminated systems, including painted walls, have been identified in Building 123~~. INSERT THE FOLLOWING PARAGRAPH AS THE OPENING PARAGRAPH IN THIS SECTION. In accordance with the Reconnaissance Level Characterization Plan, a walk through was conducted to evaluate the potential for PCBs in the 123 Cluster. Of particular concern was the possible

presence of PCBs in paint. A historical review regarding the use of PCB paints in industry and at DOE sites was conducted prior to the walk through. This review included interviewing representatives at Savanna River and PCB paint manufacturer. This data was used to delineate areas of concern during the walk through that would require sampling. One area was identified and sampled as a result of the walk through. The results were nondetect for PCBs. Based on Process Knowledge and supported by limited sampling data, there is no indication that PCBs are present in paints in the 123 Cluster. [This section was added to clarify that a process knowledge evaluation coupled with limited sampling was used to determine that PCB paints were not present in the 123 Cluster.]

It is important to note that these modifications do not in any way impact the stipulations included in the August 25, 1997 cover letter for the Building 123 PAM. It is DOE's intent to comply with these requirements. In this letter, CDPHE required that the following documents be submitted to the State prior to initiating work governed by these documents:

- Project Execution Plan;
- The IHSS 148 Sampling and Analysis Plan;
- The IHSS 148 Remediation Plan;
- The RCRA Closure Plan for Unit 40;
- The Asbestos Abatement Plan (at least one week prior to implementation); and
- The Demolition Plan for Building 123 (at least two weeks prior to implementation).

RFCA does not provide a formal requirement that the Lead Regulatory Agency (CDPHE) approve minor modifications to a PAM. However, Part 10 of RFCA states, "the Lead Regulatory Agency (LRA) may issue a Stop Work Order within seven days of receipt of the notification of any such modification. To avoid issuance of a Stop Work Order, it is imperative that the lines of communication between DOE and CDPHE be clearly delineated. If you have any questions in regard to these modifications, please contact _____ at _____.

3.0 *PROJECT APPROACH AND OBJECTIVES*

Building 123 will be decommissioned using a phased approach. A description of each of these phases and the activities that will be completed during each phase is provided below:

Phase I, Building 123 Strip-Out. The following tasks will be completed during Phase I:

- Limited asbestos abatement (for example cementitious cabinet and hood linings, mastic under a laboratory counter top)
- Removal of radioactively contaminated asbestos floor tile in Room 105, 109 and 109B.
- Removal of all carpet.
- Removal of process hoods and associated ducting, including a thorough rinse of the hood and ducting system, process waste system, and process scrubbers for perchloric acid.
- Removal of laboratory cabinets, counter tops, and sinks.
- Removal of the process waste piping and ancillary equipment after completing a RCRA Closure rinse and rinsate analysis.
- Removal of ducting, piping, and other ancillary equipment for the process scrubbers and isolation of the scrubbers.
- Removal of other miscellaneous items such as fire protection equipment that will be salvaged for future use
- Utility Isolation for Building 123 (power, water, communications, steam, natural gas, and plant air).

Phase II, Asbestos Abatement. The following asbestos containing materials will be abated during Phase II:

- Drywall mud, tape and joint compound.
- Floor tile.
- Cementitious walls, excluding the transite panels above the exterior windows.
- Pipe insulation for steam, condensate, domestic cold water, and domestic hot water. This shall include insulation of the steam lines entering Building 123 on the east side. Insulation shall be removed back to the main elevated steam/condensate lines.
- Duct insulation on roof.
- Asbestos Containing Doors.

Phase III, Demolition of Building 113, 114, 123, and 123S. The following tasks will be conducted during Phase III:

- Removal of asbestos contaminated wall panels above exterior windows.
- Removal of miscellaneous materials (for example the lead/steel vault in Room 155, transformer in rooms 123A, 132, and 159, refrigerators, and process scrubbers)
- Utility isolation for Building 113.
- Demolition of Buildings 113, 114, 123, and 123S to the foundation slab.

Phase IV, Characterization and Remediation of IHSS's 121 and 148. This phase includes the following tasks:

- Sampling the building slab and surrounding soils according to the Sampling Analysis Plan.
- Sample analysis.
- Developing a remediation plan based on the results of the sampling.
- Remediation activities.

The primary decommissioning objectives will be accomplished according to an integrated scope, schedule, and cost control system. All compliance documentation and project plans will be prepared and approved by RFETS Decommissioning and Demolition Management under a Project Execution Plan to ensure that decommissioning efforts are conducted in a safe and compliant manner.

All building utilities and associated facility safety systems will be disconnected prior to commencement of building demolition. The active process waste piping system in Building 123 (a component of RCRA Unit 40) will undergo closure according to State approved RCRA Closure Plan. The building will be safely dismantled and the resulting debris and waste will be properly characterized and disposed at appropriate off-site facilities. In addition, soil sampling beneath and adjacent to the building will be conducted using the methods described in a Sampling and Analysis Plan (SAP) prepared for this project. The SAP will be submitted to CDPHE at least 45 days prior to implementation. Underground pipelines will be managed with respect to soil sample analyses results. Soil remediation, if necessary will be conducted with respect to RFCA Action Levels in a manner that is protective of human health and the environment.

The project will use standard industry practices, but will also incorporate lessons learned from previous demolition projects at RFETS and utilize personnel with expertise in decontamination and decommissioning activities.

SUMMARY OF WASTE MANAGEMENT PLAN
BUILDING 123 D&D PROJECT November 10, 1997

Estimated generation volumes incorporated into Building 123's Waste Management Plan (June 1997) may differ from those volumes used in this summary. Variations are due to completion of additional characterization and selection of waste management options.

WASTE STREAM	PACKAGING AND ON-SITE STORAGE	FINAL DISPOSITION	ESTIMATED GENERATION VOLUME
ASBESTOS NON-RAD • Friable • Non-friable	Gray 55 gallon drums or strong tight boxes; friable 6 mm plastic double bagged ; crate, roll-off; B666 or outside	• Friable, Kettleman Hills through Chem Waste Contract • Non-friable- U.S.A. Waste, Erie Co.	• Friable 500 cu yds • Non-friable <1 cu yd
ASBESTOS RAD • Friable • Non-friable	White 55 gallon drums or boxes; 6 mm plastic double bagged or strong tight boxes/crates; B664 or B644 Cargo Containers	• Nevada Test Site (NTS)	• 4 cu yds
PCBs NON-RAD • ballasts non-leaking	Black and yellow drum with a plastic liner Building 666	• Chem Waste contract to Rollins Inc. at Deerpark, Tx.	• < 1 cu yd. This sum is a total of all PCB categories. Until the ballasts are removed, it is impossible to categorize this waste stream correctly.
PCBs NON-RAD • leaking ballasts and all other regulated PCBs (articles, etc.)	Black and yellow drum with plastic liner; document on traveler if TSCA regulated. Building 666	• Chem Waste contract to Rollins Inc. at Deerpark, Tx.	• Totaled in PCB NON-RAD category
PCBs RAD • ballasts, non-leaking (LLW only, not TSCA regulated)	White drum with a plastic liner B666	• Oak Ridge	• Totaled in PCB NON-RAD category
PCBs RAD • Leaking ballasts and all other rad contaminated (LLW) and TSCA regulated wastes	White drum with a plastic liner B666	• Oak Ridge	• Totaled in PCB NON-RAD category
Hazardous Waste NON-RAD • fluorescent tubes • Solvents, Paints, lead, chemicals, metals	Black and white drum • tubes crushed on-site 123S or RCRA Unit 1	• Chem Waste Contract	• <1 cu yd

5

WASTE STREAM	PACKAGING AND ON-SITE STORAGE	FINAL DISPOSITION	ESTIMATED GENERATION VOLUME
• Hazardous waste rinsate (rad and non-rad) • This waste stream will be generated during RCRA closure of part of RCRA unit 40.	Process waste system,	• Managed on-site in a wastewater treatment unit (building 374)	• 600 gallons
Mixed Wastes RAD • Non-homogeneous • Homogeneous	White 55 gallon drum 904A or Unit 14 or Unit 15A in Building 906	• Non homogeneous LLMW does not have a designated disposal site at this time Homogeneous • Oak Ridge LLM and LL solvents • Envirocare, Utah	• 25 cu yds Envirocare can take solids and liquids (non-organics) that can be solidified
Low Level Waste • plaster, wall materials, windows, panels, cement, etc.	White drum or white boxes ½ or full size wooden crates complying with WO 1100 or WO 4034 B664 Cargo Containers or B440 Cargo Containers	• Nevada Test Site	• 300 cu yds
Sanitary or Industrial Waste NON-RAD	Roll offs either 20 or 30 yard roll offs	• U.S.A. Waste, Erie, Colorado	• 150 cu yds
PU&D materials and processed RCRA Scrap Metal destined for reclamation NON-RAD	Not regulated under RCRA [file systems, cabinets, shelves, desks, fumes hoods, muffler furnaces, lab benches, etc.]	• Per PU&D; or • Per RF contract	• 500 cu yds
Processed RCRA Scrap Metal destined for reclamation RAD	White box and/or container	• No contract yet in place. Options include SEG and MSC. No shipments will be made until a contract is in place with a K-H approved vendor.	• Characterization not complete, estimate unavailable.

In the event a waste stream, not identified in this summary, is generated by this project and this wastes stream has the potential of impacting human health or the environment, then RMRS or its subcontractor is required to immediately notify Kaiser-Hill's Environmental Management and Compliance Division of the existence of this wastes stream. Jointly RMRS and Kaiser-Hill will determine the most appropriate management and disposal options for this waste stream.